

Dear FCC:

Please consider these Reply to Comments for Docket 16-239NPRM, as well as for other petitions such as RM-11708 and RM-11759 that deal with the amateur radio service.

I am a licensed amateur radio operator, with call sign N5KT, and I am replying since I will be greatly impacted by any rulings surrounding these rulemaking proposals and the NPRM .

The many comments in these proceedings demonstrate vast number of amateur operators are against both RM 11708 and Docket 16-239 NPRM. The amateur community, through the FCC ECFS system, has very clearly rejected both the ARRL's RM-11708 petition and the FCCs proposed solution. More than 90% of the over 100 replies filed in the NPRM are firmly against the FCC proposal, and urge that the FCC, and not a voluntary organization like the ARRL, provide narrowband emission limits that protect existing narrowband communication (less than 200 Hz CW and data operators, and less than 400 or 500 Hz RTTY and data operators).

The vast number of commenters urge that some band width limit be Instituted and regulated by the FCC, and that the CW/RTTY/narrow band operators must be protected with a regulatory, not voluntary, band width emission limit of 200 HZ and 400/500 Hz in the lower portions of every data sub band.

Most replies noted the current violations of ACDS/robot stations and the use of non-published protocols (Pactor II/III), along with out of band emissions of the ACDS stations. Commenters are clear that the FCC must clarify its rules for open transmissions that are published and not proprietary, and must clean up current ACDS/robot stations before allowing any expansion of bandwidth or their privileges.

Many commenters also urge the FCC to determine if using https// web browsing (which ensures encryption even when using an open air interface) and if email is properly allowed on HF/MF amateur radio bands. Given the documented evidence of business use, bypass of other commercial means, and out of band ACDS transmissions, the Commission must carefully consider the impact of its rulings on open, transparent, or encrypted transmissions that the FCC and others cannot detect.

I urge the FCC to realize the gravity of its NPRM and the rejection of RM-11708. The amateur radio service requires the FCC to solve existing ACDS and encryption issues and to ensure narrow band operations (200 Hz for JT31, PSK31, CW) and 400/500 Hz (RTTY) are protected as many governments and the IARU require. These existing IARU and governmental protections provide generally accepted standards for the FCC to follow.

Sincerely,
Gerald Doucet
N5KT